



3000 Two Logan Square
Eighteenth and Arch Streets
Philadelphia, PA 19103-2799
215.981.4000
Fax 215.981.4750

Jeremy D. Frey
direct dial: 215.981.4445
direct fax: 866.422.3552
freyj@pepperlaw.com

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Via ECF

Hon. Dora L. Irizarry
U.S. District Judge
U.S. District Court for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Freeman, et al. v. HSBC Holdings PLC, et al., Case No. 14-cv-6601(DLI)(CLP)

Dear Chief Judge Irizarry:

This Firm represents Bank Saderat PLC ("BSPLC") in the above case. The Moving Defendants (which term does not include BSPLC) have made submissions on *Kemper v. Deutsche Bank AG*, No. 18-1031, ___ F.3d ___ (7th Cir. 12-12-18). Most recently, the Moving Defendants made a further submission regarding *Kemper* on January 14, 2018.

Throughout the *Freeman* case, BSPLC has joined in the positions of its co-defendants applicable to the relevant allegations and Counts in which BSPLC is included as a defendant. For the avoidance of doubt, BSPLC joins in the positions of the Moving Defendants with respect to *Kemper*.

Thank you for your attention to this matter.

Respectfully submitted,

/s/ Jeremy D. Frey

Jeremy D. Frey

Cc: All counsel of record (via ECF)